

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: January 25, 2024 at 10:00 A.M. ET

Objection Deadline: December 20, 2023 at 4:00 P.M. ET

Ref. Nos. 4498, 4928, 4930 & 5081

**CERTIFICATION OF COUNSEL REGARDING THIRD MOTION OF DEBTORS
FOR ENTRY OF AN ORDER EXTENDING THE EXCLUSIVE PERIODS DURING
WHICH ONLY THE DEBTORS MAY FILE A CHAPTER 11 PLAN
AND SOLICIT ACCEPTANCES THEREOF**

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On December 5, 2023, the Debtors filed the *Third Motion of Debtors for Entry of an Order Extending the Exclusive Periods During Which Only the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof* [D.I. 4498] (the “Motion”).

2. On December 20, 2023, the estates of BlockFi, Inc. and its affiliated debtors-in-possession (collectively, “BlockFi”) filed the *Reservation of Rights of the BlockFi Wind-Down Debtors to the Third Motion of Debtors for Entry of an Order Extending the Exclusive Periods During Which Only the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof* [D.I. 4928] (the “BlockFi ROR”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

3. On December 20, 2023, the Official Committee of Unsecured Creditors (the “Committee”) filed the *Statement of Official Committee of Unsecured Creditors Regarding Third Motion of Debtors for Entry of an Order Extending the Exclusive Periods During Which Only the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof* [D.I. 4930] (the “Committee Statement”).

4. On December 21, 2023, the Voyager Wind-Down Debtor (“Voyager”) filed the *Statement of the Voyager Wind-Down Debtor Regarding the Third Motion of Debtors for Entry of an Order Extending the Exclusive Periods During Which Only the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof* [D.I. 5081] (the “Voyager Statement”).

5. As of the date hereof, no other formal objections or other responses to the Motion have been filed or served on the Debtors.

6. The Debtors have conferred with BlockFi, the Committee, Voyager and the Office of the United States Trustee who have advised that they do not object to entry of the proposed form of order attached to the Motion (the “Proposed Order”), a copy of which is attached hereto for the Court’s convenience as **Exhibit A**.

7. It is hereby respectfully requested that the Proposed Order, which shall be uploaded to CM/ECF in accordance with the Court’s electronic order processing procedures, be entered at the Court’s earliest convenience.

Dated: January 25, 2024
Wilmington, Delaware

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/s/ Matthew R. Pierce

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